

## Hazardous Waste Management on the Construction Site

Proper storage and disposal of construction materials and hazardous wastes from the construction site prevents the discharge of pollutants to storm drains and watercourses. Managing hazardous wastes - to reduce potential risks to project personnel and the site - requires knowledge and diligence from both contractor and Caltrans staff. This bulletin reviews typical hazardous waste management challenges on construction sites and summarizes requirements from Best Management Practice (BMP) WM-6, Hazardous Waste Management.

### Typical Hazardous Wastes

- WM-6 applies to all hazardous wastes except aerially deposited lead soils (covered under BMP WM-7). Typical hazardous wastes on the construction site include:
- Spills or leaks of construction materials such as concrete curing compounds, asphalt products, paints, etc.
- Petroleum products from equipment operation and maintenance
- Septic wastes
- Pesticides and herbicides
- Any material deemed hazardous waste in California Code of Regulations (CCR) Title 22, Division 4.5; or listed in Code of Federal Regulations (CFR) 40, Parts 110, 117, 261, or 302.



All construction personnel should be trained to respond to potential storm water pollution from



A secondary containment facility would have prevented contamination of surrounding soil.

### Common Challenges

Typical challenges of managing hazardous wastes on a construction project include:

- All construction personnel must be properly trained regarding management of hazardous wastes.
- Construction materials that are potentially hazardous should be stored under watertight conditions, while still making them readily available for use.
- Hazardous waste collected from the project must be stored and disposed of in a manner that is appropriate for that particular type of waste.
- The contractor must be prepared to respond to spills or leaks that occur anywhere on the project site.
- Failure to clean up spills, or improper storage of hazardous materials, may trigger sampling and analysis requirements.

### Education and Training

Each individual on the project has some level of responsibility for managing hazardous wastes, from the laborer's responsibility for cleaning up spilled materials, to the Water Pollution Control Manager's responsibility for notifying the appropriate agencies. All project personnel should be trained to recognize hazardous wastes on the project and to respond appropriately to ensure safety and protect the environment.

### Material Storage Procedures

A number of common construction materials are considered hazardous wastes when spilled or leaked. Such materials include concrete curing compounds, asphalt products, paints, stains, wood preservatives, roofing tar, and palliatives.

Such materials should be stored under watertight conditions to prevent their discharge in storm water. Watertight conditions include storage in a watertight container, storage under a watertight roof or within a building, or protection by temporary cover and containment that prevents storm water contact and runoff from the storage area.

### Waste Storage and Disposal

Hazardous wastes must be stored in sealed containers constructed of suitable material with a label that clearly identifies the contents and accumulation date. Store waste containers in containment facilities that are covered during non-working days during the rainy season and prior to rain events, year-round.

The Storm Water Quality Practice Guidelines identify new temporary containment requirements that are being incorporated

into WM-6. New guidelines require a spill containment volume able to contain precipitation from a 24-hour 25-year storm event, plus the greater of 10% of the aggregate volume of all containers or 100% of the largest container within its boundary, whichever is greater. Wastes are to be disposed of properly within 90 days of being generated.

### ***Leaks and Spills***

If a leak or spill occurs, it must be cleaned up prior to a rain event.

Spill cleanup kits should be maintained on site at storage locations to facilitate and expedite cleanup. Spills of hazardous wastes or materials, including any affected soil or water, should be stored as hazardous waste and disposed of properly.

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